

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
SERTA SIMMONS BEDDING, LLC,	§	Case No. 23-90020 (DRJ)
<i>et al.,</i>	§	
	§	
Debtors.¹	§	(Jointly Administered)
	§	
-----	§	Re: Docket Nos. 24, 137, 184
	§	
SERTA SIMMONS BEDDING, LLC,	§	
SERTA SIMMONS BEDDING	§	Adversary Proc. No. 23-03007 (DRJ)
MANUFACTURING COMPANY,	§	
AND NATIONAL BEDDING COMPANY,	§	Re: Docket No. 3
LLC	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
THOSE PARTIES LISTED IN	§	
APPENDIX A TO COMPLAINT,	§	
	§	
Defendants.	§	
-----	§	

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Dawn Intermediate, LLC (6123); Serta Simmons Bedding, LLC (1874); Serta International Holdco, LLC (6101); National Bedding Company L.L.C. (0695); SSB Manufacturing Company (5743); The Simmons Manufacturing Co., LLC (0960); Dreamwell, Ltd. (2419); SSB Hospitality, LLC (2016); SSB, LLC (6691); Simmons Bedding Company, LLC (2552); Tuft & Needle, LLC (6215); Tomorrow Sleep LLC (0678); SSB Retail, LLC (9245); and World of Sleep Outlets, LLC (0957). The Debtors' corporate headquarters and service address for these chapter 11 cases is 2451 Industry Avenue, Doraville, Georgia 30360.

**SERTA SIMMONS BEDDING, LLC,
INVESCO SENIOR SECURED
MANAGEMENT, INC., CREDIT
SUISSE ASSET MANAGEMENT, LLC,
AND BARINGS LLC,**

Plaintiffs,

v.

**AG CENTRE STREET PARTNERSHIP
L.P., AG CREDIT SOLUTIONS NON-
ECI MASTER FUND, L.P., AG SF
MASTER (L), L.P., AG SUPER FUND
MASTER, L.P., SILVER OAK
CAPITAL, L.L.C., ASCRIBE III
INVESTMENTS, LLC, COLUMBIA
CENT CLO 21 LIMITED, COLUMBIA
CENT CLO 27 LIMITED, COLUMBIA
FLOATING RATE INCOME FUND, A
SERIES OF COLUMBIA FUNDS
SERIES TRUST II, COLUMBIA
STRATEGIC INCOME FUND, A
SERIES OF COLUMBIA FUNDS
SERIES TRUST I, CONTRARIAN
CAPITAL FUND I, L.P., CONTRARIAN
CENTRE STREET PARTNERSHIP,
L.P., CONTRARIAN DISTRESSED
DEBT FUND, L.P., GAMUT CAPITAL
SSB, LLC, LCM XXII LTD., LCM
XXIII LTD., LCM XXIV LTD., LCM
XXV LTD., LCM 26 LTD., LCM 27
LTD., LCM 28 LTD., NORTH STAR
DEBT HOLDINGS, L.P.,
SHACKLETON 2013-III CLO, LTD.,
SHACKLETON 2013-IV-R CLO, LTD.,
SHACKLETON 2014-V-R CLO, LTD.,
SHACKLETON 2015-VII-R CLO, LTD.,
SHACKLETON 2017-XI CLO, LTD., Z
CAPITAL CREDIT PARTNERS CLO
2018-1 LTD., AND Z CAPITAL
CREDIT PARTNERS CLO 2019-1 LTD.**

Defendants.

Adversary Proc. No. 23-09001 (DRJ)

**NOTICE OF FILING OF FURTHER REVISED PROPOSED
ORDER (I) SCHEDULING CERTAIN HEARING DATES
AND DEADLINES, (II) ESTABLISHING CERTAIN PROTOCOLS IN
CONNECTION WITH SUCH HEARINGS, AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT, on January 23, 2023, Serta Simmons Bedding, LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Debtors’ Emergency Motion for Entry of Order (I) Scheduling Certain Hearing Dates and Deadlines, (II) Establishing Certain Protocols in Connection With Such Hearings, and (III) Granting Related Relief* (Docket No. 24) (the “**Motion**”), with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Proposed Order**”).²

PLEASE TAKE FURTHER NOTICE THAT, on January 27, 2023 the Debtors filed a *Notice of Filing of Revised Proposed Order (I) Scheduling Certain Hearing Dates and Deadlines, (II) Establishing Certain Protocols in Connection With Such Hearings, and (III) Granting Related Relief* (Docket No. 184), with a revised proposed order reflecting certain informal comments received from the Consenting Creditors attached thereto as Exhibit A (the “**Revised Proposed Order**”).

PLEASE TAKE FURTHER NOTICE THAT, the Debtors hereby file a further revised proposed *Order (I) Scheduling Certain Hearing Dates and Deadlines, (II) Establishing Certain Protocols in Connection With Such Hearings, and (III) Granting Related Relief*, attached hereto as Exhibit A (the “**Further Revised Proposed Order**”), which reflects further discussions among the parties following the scheduling conference held before the Court on January 27, 2023. The Further Revised Proposed Order is agreed upon as between the Debtors and the Consenting

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Creditors, but not as between the Debtors and the defendants to the adversary proceedings bearing case numbers 23-09001 and 23-03007.

PLEASE TAKE FURTHER NOTICE THAT, a redline of the Further Revised Proposed Order marked against the Proposed Order is attached hereto as **Exhibit B** (the “**Cumulative Redline**”).

PLEASE TAKE FURTHER NOTICE THAT, a redline of the Further Revised Proposed Order marked against the Revised Proposed Order is attached hereto as **Exhibit C** (the “**Incremental Redline**”).

Dated: February 1, 2023
Houston, Texas

Respectfully submitted,

/s/ Gabriel A. Morgan

WEIL, GOTSHAL & MANGES LLP
Gabriel A. Morgan (24125891)
Stephanie N. Morrison (24126930)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Gabriel.Morgan@weil.com
Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Ray C. Schrock (admitted *pro hac vice*)
Alexander W. Welch (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Ray.Schrock@weil.com
Alexander.Welch@weil.com

*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on February 1, 2023, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' claims, noticing, and solicitation agent.

/s/ Gabriel A. Morgan

Gabriel A. Morgan